

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554

In the Matter of:)	
)	
Petition for Rulemaking to Allow the MA3)	
All-Digital Mode of HD Radio for AM)	RM-11836
Stations)	
)	
Revitalization of the AM Radio Service)	

Comments of Hatfield & Dawson Consulting Engineers, LLC

Hatfield & Dawson Consulting Engineers, whose qualifications and experience as engineering practitioners regarding medium wave amplitude modulated (“AM”) broadcasting extend over decades, both in the United States and in many other countries, are pleased to respond to the Petition for Rulemaking in this matter.

While amplitude modulation’s long history is the result of its simplicity and the straightforward nature of its transmission and reception methods, the proliferation of noise and interference of all types in the medium wave broadcasting band has reduced the effective service area of many AM stations. This is particularly so in recent years with the ubiquitous use of electronic devices for all types of industrial and domestic uses.

Given this well documented situation, and the availability of modern solid state integrated circuit equipment for the generation and reception of digital transmission modes, the Commission would, in our view, be well advised to allow licensees of medium wave broadcasting stations to

employ all digital transmission as an option. However, we caution that such authorization should not be limited to one proprietary mode. The use of various modes of the Digital Radio Mondiale (“DRM”) system has demonstrated its excellent performance, and it is not unlikely that other digital technical protocols may be developed in the future.

Therefore we support the adoption of the Petition’s recommendations, so long as they are not restricted to the proprietary MA3 mode of the “HD Radio” system.

Respectively Submitted,

Stephen S. Lockwood, P.E., President

Thomas S. Gorton, P.E., Senior Engineer



Benj. F. Dawson III, P.E., Senior Engineering
Consultant

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